NOTICE OF INTENT TO REISSUE A HAZARDOUS WASTE MANAGEMENT PERMIT TO ARNOLD ENGINEERING DEVELOPMENT CENTER AND TO APPROVE CORRECTIVE ACTION REMEDIES

Link to Permit, Fact Sheets and Images

The Tennessee Department of Environment and Conservation's (TDEC) Division of Solid Waste Management (DSWM) proposes to reissue a hazardous waste management permit to Arnold Engineering Development Center (AEDC) that would allow the facility to continue to operate an existing hazardous waste storage facility. This action follows the pre-application public meeting conducted by the facility on April 20, 2004, as required by Tennessee Rule 1200-1-11-.07(2)(c)3(i). No comments were received at this meeting.

AEDC, EPA ID Number: TN8 57 002 4044, located at Arnold Air Force Base, Coffee and Franklin Counties, Tennessee, is currently permitted under Tennessee Permit Number TNHW-054. The original permit was issued on October 28, 1994 and was effective for ten years. AEDC submitted Part A and Part B Applications to DSWM for renewal of the facility's hazardous waste management permit on May 4, 2004, thus enabling the facility to continue to operate under the current permit until a final decision is made. The receipt of the renewal application was public noticed on March 17, 2004. The current permit allows the facility to manage a maximum quantity of 57,420 gallons (1,044 55-gallon drums) in Building 1456. The proposed permit is for continued use of the container storage building with the same capacity limits. If issued, the permit would be effective for ten years. A Fact Sheet has been prepared that summarizes the draft permit requirements.

Other conditions of the permit will require AEDC to notify the Division of imminent hazards, and when applicable, comply with the requirements developed under land disposal restrictions and organic air emission standards. Also included are conditions for corrective action of solid waste management units (SWMUs) and areas of concern (AOCs). AEDC will be required to investigate any release of hazardous waste or hazardous constituents at the facility, regardless of the time at which waste was placed in a unit, and to take appropriate corrective action for any such release. A table in the Fact Sheet lists proposed corrective action status changes for units previously investigated. Forty-six units are selected to be added to the no further action table in the permit and three units are to be added to the table that requires implementation of the selected final remedy.

Included with the Fact Sheet is a Statement of Basis that recommends remedies for those releases identified during the corrective action process. Designed to facilitate public participation in the remedy selection process, the Statement of Basis summarizes the nature and extent of the contamination, the potential risks to human health and the environment, and the remedy to be implemented. The permit proposes final remedies for three closed units: SWMU 12, Fire Protection Training Area No. 2 and Overflow Pond/Drainage Area; SWMU 13, Burn Area No. 1; and SWMU 14, Landfill No. 1. The remedies require AEDC to maintain site security, prevent exposures to contaminated media, maintain landfill caps and perform groundwater corrective action and long-term monitoring.

The permit is proposed to be reissued under the authority of the Tennessee Hazardous Waste Management Act of 1977, as amended, Tennessee Code Annotated, Section 68-212-101 et seq., and Rule Chapter 1200-1-11, Hazardous Waste Management.

<u>Copies of AEDC's applications, draft permit, fact sheet, statement of basis, and public notice</u> are available for public inspection at the Coffee County Lannom Memorial Library, 312 N. Collins Street, Tullahoma, TN (telephone 931-455-2460). These materials are also available for public

inspection during normal business hours, 8:00 a.m. to 4:30 p.m., Monday through Friday, except legal holidays, at the TDEC Columbia Environmental Assistance Center, Public Access Area, 2484 Park Plus Drive, Columbia, Tennessee 384011 (telephone 931-380-3371).

Any interested person may submit written comments on DSWM's proposal or request a public hearing by contacting Ms. Rita A. Swett; Treatment, Storage and Disposal Section; Division of Solid Waste Management; TDEC; 5th Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535; telephone 615-532-0828; or e-mail to Rita.Swett@state.tn.us. The comments or request for a public hearing must be received by <u>4:30 p.m., September 15, 2008</u>, to assure consideration. After considering all public comments received, the DSWM Director will issue a final permit decision and a Response to Comments.

TDEC is committed to principles of equal opportunity, equal access, and affirmative action. Contact the EEO/AA Coordinator at 1-888-867-7455 or the ADA Coordinator at 1-866-253-5827 for further information. Hearing impaired callers may use the Tennessee Relay Service (1-800-848-0298).

Persons who wish to be on DSWM's mailing list should request a <u>Mailing List Request Form</u> by calling or writing: Public Participation Officer; Division of Solid Waste Management; TDEC; 5th Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535 (615-532-0798); or e-mail Solid.Waste@state.tn.us.

NOTICE ISSUED: July 29, 2008